

**BEFORE THE
STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

In the Matter of the Application of Evergy)
Kansas Metro, Inc., Evergy Kansas South,)
Inc. and Evergy Kansas Central, Inc. for) Docket No. 22-EKME-254-TAR
Approval of its Demand-Side Management)
Portfolio Pursuant to the Energy Efficiency)
Investment Act (KEEIA), K.S.A. 66-1283.)

**CROSS-ANSWERING TESTIMONY
OF
PAUL H. RAAB
ON BEHALF OF
ATMOS ENERGY CORPORATION
BLACK HILLS/KANSAS GAS UTILITY COMPANY, LLC D/B/A BLACK HILLS
ENERGY AND
KANSAS GAS SERVICE**

JUNE 24, 2022

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DOCKET NO. 22-EKME-254-TAR**

1 **Q.** **Please state your name.**

2 A. My name is Paul H. Raab.

3 **Q.** **Are you the same Paul H. Raab who has previously filed direct testimony in this**
4 **docket?**

5 A. Yes.

6 **I. PURPOSE OF TESTIMONY**

7 **Q.** **What is the purpose of your testimony?**

8 A. The purpose of my cross-answering testimony is to respond to portions of the direct
9 testimonies of Staff Witnesses Dr. Robert H. Glass and Leo M. Haynos, Citizens' Utility
10 Ratepayer Board ("CURB") Witnesses Alice Napoleon and Danielle Goldberg, Natural
11 Resources Defense Council ("NRDC") Witness Stacy L. Sherwood, and Climate + Energy
12 Project ("CEP") Witness Justin Schott. Witness Dr. Glass, Witness Napoleon and Witness
13 Schott propose changes to the Evergy programs to which I will respond. Witness Haynos,
14 Witness Goldberg, and Witness Sherwood propose changes to Evergy's TRM, the
15 reporting of program results, and the development of inputs for the TRM.

The Gas Utilities agree with and support the program changes proposed by Staff Witness Dr. Glass and agree, with qualifications, to those program changes proposed by CEP Witness Schott. The Gas Utilities disagree with those program changes proposed by CURB Witness Napoleon as they are in violation of both the Kansas Energy Efficiency Investment Act (“KEEIA”) and prior Commission precedent.

The Gas Utilities are also in general agreement with the parties' proposed changes to Evergy's TRM, the reporting of program results, and the development of inputs for the TRM. Specifically, the Gas Utilities agree with requests for more transparency in the development and application of savings estimates from the Company's TRM made by Staff Witness Haynos, CURB Witness Goldberg, and NRDC Witness Sherwood.

II. ORGANIZATION OF TESTIMONY

Q. How is your cross-answering testimony organized?

A. My cross-answering testimony is organized into three additional sections. Section III provides my discussion of the issues related to recommended program changes that have been raised in this proceeding. Section IV provides my discussion of the issues related to proposed changes to Evergy's TRM, the reporting of program results, and the development of inputs for the TRM. Finally, Section V provides my conclusions and recommendations.

III. RESPONSE TO PROPOSED PROGRAM CHANGES

Q. Please summarize the testimony of Staff Witness Dr. Robert H. Glass as it relates to proposed program changes.

A. Staff Witness Dr. Glass provides Staff's ultimate recommendations related to the Evergy program proposals to the Commission based on an economic interpretation of KEEIA; a review of past Commission DSM Orders; discussion of Staff's cost effectiveness analysis;

1 an analysis of the Residential, Business, and Pilot DSM Programs; and an analysis of
2 Evergy's requested variances. This review leads Dr. Glass to the following
3 recommendation, among others:

4 Staff recommends that the [Whole Business Efficiency and Hard-to-Reach
5 Business] programs be approved as concepts, but that the Commission insist that
6 Evergy rework these programs and when they are fixed then seek Commission
7 approval before implementation.¹

8 **Q. What specific elements of these two programs does Dr. Glass find deficient?**

9 A. Dr. Glass finds that both programs exhibit benefit/cost results that are not consistent with
10 guidance provided by the KEEIA and Commission's own cost-effectiveness guidance.
11 However, he opines that such programs have value and, rather than reject them outright,
12 he recommends that they be approved "in concept" but not approved by the Commission
13 until the flaws noted by Staff are fixed.

14 **Q. Do the Gas Utilities agree with this assessment and the proposed recommendation?**

15 A. The Gas Utilities have done no cost-effectiveness testing of any of Evergy's proposed
16 programs and can neither confirm nor refute either Evergy's or Staff's benefit/cost test
17 results. However, as noted in my direct testimony, the Gas Utilities have also identified
18 deficiencies with these two programs and the reassessment called for by Staff is an
19 excellent opportunity for Evergy to correct the identified "like-for-like" deficiencies the
20 Gas Utilities have identified so that the programs are consistent with KEEIA and prior
21 Commission orders.

22 **Q. Please summarize the proposed program changes recommended by CURB Witness**
23 **Alice Napoleon.**

¹ Direct Testimony of Robert H. Glass, page 107, lines 13-15.

1 A. CURB Witness Napoleon recommends that the Commission direct Evergy to develop
2 offerings for residential new construction.² Ms. Napoleon bases this recommendation on
3 her assessment of Evergy’s proposal based on KCC goals related to energy efficiency³ and
4 her interpretation of those goals.⁴

5 **Q. Do the Gas Utilities agree with this assessment and the proposed recommendation?**

6 A. It is a notable concern that her assessment excludes any analysis of whether Evergy’s
7 programs violate the prohibitions against fuel switching codified in KEEIA as well as the
8 Commission’s precedents related to fuel-switching that have been developed over the last
9 15 years or so. It appears that this failure to account for the Commission’s prohibition
10 against fuel switching and KEEIA’s requirement of incentive payments only for “like-for-
11 like” technologies leads Ms. Napoleon to falsely conclude that Evergy’s proposed portfolio
12 should include a residential new construction program.

13 The Gas Utilities are similarly concerned with the recommendation made by CEP
14 Witness Justin B. Schott that the number of incentives for air and water heater heat pumps
15 in the Evergy portfolio should be “considerably higher.”⁵ If the target for these incentives
16 envisioned by Mr. Schott is existing electric applications, the Gas Utilities do not have an
17 objection. If, however, the target of these incentives is current and future natural gas
18 applications, the Gas Utilities do object as the payment of such incentives is in violation of
19 KEEIA and prior Commission Orders, as explained more fully in my direct testimony.

20 **IV. RESPONSE TO PROPOSED CHANGES TO EVERGY’S TRM**

² Direct Testimony of Alice Napoleon, page 35, lines 5-7.

³ Ibid., page 19, line 1 to page 21, line 3.

⁴ Ibid., page 21, line 4 to page 22, line 5.

⁵ Direct Testimony of Justin Schott, page 20, line 9.

1 **Q. Please summarize the testimony of Staff Witness Leo M. Haynos as it relates to Staff's**
2 **proposed changes to Evergy's TRM.**

3 A. Staff Witness Leo M. Haynos addresses the Technical Reference Manual ("TRM") used in
4 the energy efficiency model and offers recommendations on how the input data and the
5 other aspects of the program should be validated. Based on Mr. Haynos's conclusions
6 noted at page 15, line 12 – page 16, line 5 of his direct testimony, Mr. Haynos appears to
7 be generally skeptical of the accuracy of the savings values presented in the TRM.⁶

8 Mr. Haynos also recommends that the Commission should allow Staff to hire an
9 EM&V auditor to assist in (1) the review of the EM&V plan submitted to the Commission
10 for approval; (2) review of the EM&V contractor analysis of the program results; (3)
11 review NTG and TRM calculations and recommend changes to these parameters; (4) audit
12 the accuracy of the various program implementers; and (5) provide Staff with
13 recommendations for any changes to the program.

14 **Q. Do the Gas Utilities agree with these recommendations?**

15 A. Yes. Mr. Haynos's initial concern about the accuracy of the savings estimates presented
16 in the TRM is shared by the Gas Utilities and provides additional support for the Gas
17 Utilities' recommendation that:

18 The Commission should require better and more transparent documentation of the
19 payment of incentives including what fuel is being promoted and what fuel was
20 intended to be used for this purpose prior to the payment of the incentive. This
21 information should be available to all parties including the Gas Utilities so that the
22 amount of electricity load potentially gained at the expense of natural gas can be
23 quantified and any increase in total energy usage can be quantified.⁷

⁶ "I note the Portfolio Filing presented to the Commission for approval contains an EM&V framework because the EM&V plan has not yet been designed. Similarly, the TRM in the filing provides a composite list of savings that are at best estimates of savings." Direct Testimony of Leo M. Haynos, page 15, lines 17-20, emphasis added.

⁷ Direct Testimony of Paul H. Raab, page 6, lines 1-6.

1 Mr. Haynos's recommendation that the Commission should allow Staff to hire an
2 EM&V auditor also seems to be a reasonable recommendation that can be supported by
3 the Gas Utilities. However, the Gas Utilities would further request that this process and its
4 results be transparent so that all parties can assure themselves that the results are accurate
5 and that Evergy is not using its rebates to gain load at the expense of the Gas Utilities, in
6 violation of KEEIA and Commission precedent as discussed in my direct testimony filed
7 in this docket.

8 **Q. Why is it so important to the Gas Utilities that the TRM incorporate accurate**
9 **estimates of energy savings?**

10 A. As noted by Staff Witness Dr. Glass, measuring the effectiveness of an energy efficiency
11 program requires estimating something that did not happen--the amount of electricity the
12 program caused not to be consumed.⁸ Or, in the context of those programs that incent fuel-
13 switching (inadvertent or not), measuring the effectiveness of an "energy efficiency"
14 program requires estimating an increase in the amount of electricity the program caused to
15 be consumed because it caused an appliance switch from natural gas or another fuel.

16 This important feature of program evaluation is also required in the proper
17 application of the TRC. As noted by CURB Witness Goldberg, Evergy's TRC test
18 excludes benefits associated with non-electric fuel savings:

19 Unlike the utility cost test, which may appropriately focus its analysis on its
20 delivery fuel (in the case of Evergy, electricity), the TRC test takes a broader view.
21 If the TRC test accounts for participant costs, it should also account for the
22 participant savings associated with non-electric fuels, such as gas, oil, propane,
23 water, and any other resources that are reduced with programmatic funding and
24 represent real cost savings for customers. In its current form, Evergy's TRC test
25 accounts only for participant costs and ignores all participant benefits.⁹

⁸ Direct Testimony of Robert H. Glass, page 93, lines 14-17.

⁹ Direct Testimony of Danielle Goldberg, page 7, line 19 – page 8, line 5.

Both of the above issues are important because of Dr. Glass's concerns with respect to what Dr. Glass refers to as "The Competitive Distortion Created by Business Energy Efficiency Programs." While Dr. Glass does not isolate competitive distortions in end-use fuel markets in his discussion, the Gas Utilities believe that such competitive distortions are as important, if not more so, than those discussed by Dr. Glass. Accordingly, a transparent TRM and EM&V process is required to identify any (KEEIA- and Commission-prohibited) fuel switching that takes place because of Evergy's programs and to allow for program modifications when such competitive distortions are identified.

Q. Do parties other than the Gas Utilities also express the need for transparency in the process of determining savings and reporting the results?

A. The need for transparency pervades the testimony of many other witnesses in this proceeding. For example, even though not mentioned by Staff Witnesses Grady and Hall, their analysis and recommendations depend critically on an accurate measure of costs and savings.¹⁰ Likewise, Staff Witness Ellis' recommendations depend critically on a transparent EM&V and reporting process to which all parties have input:

If an appropriate alternative cannot be found, then criteria for determining "effectiveness" should be established in the EM&V plan as discussed in Staff witness, Leo Haynos' testimony.¹¹

The NRDC, through its witness Stacy L. Sherwood, recommends the following with respect to Evergy's program reporting:

Evergy's proposed DSM portfolio, if approved, will not have established reporting metrics for its performance summary as it is the first time a program will be implemented by Evergy in Kansas. Rather than allowing Evergy to make a first attempt at reporting its program results, I recommend the Commission direct Evergy to convene a working group to establish the reporting parameters. The

¹⁰ These witnesses address Evergy's Earnings Opportunity (EO) and Throughout Disincentive (TD) proposals, both of which are directly related to the savings generated by the Evergy DSM programs.

¹¹ Direct Testimony of Lana M. Ellis, page 2, lines 13-15.

1 working group should continue to meet after the reporting parameters are
2 established to ensure that the level of reporting is consistent as the programs roll
3 out.¹²

4 CURB's presentation in this case is also heavily focused on the need for
5 transparency in the calculation of program cost effectiveness. For example, CURB
6 Witness Alice Napoleon indicates that Evergy's cost-effectiveness calculations and the
7 TRM components of Evergy's proposed EM&V framework lack transparency.¹³ Based on
8 her evaluation of the Evergy filing, CURB Witness Danielle Goldberg concludes that
9 "Evergy could improve transparency around its assumptions and methods, specifically
10 regarding its cost-effectiveness calculations, its Technical Resource Manual ("TRM"), and,
11 more generally, within the Excel workbooks used to support the 2023-2026 DSM Portfolio
12 Filing."¹⁴ Ms. Goldberg expounds on the advantages of an accessible and transparent cost-
13 effectiveness tool:

14 It is in the best interest of both Evergy and its ratepayers to have an easily digestible
15 model that clearly defines all sources and assumptions. Models that require unique
16 platforms to operate or extensive background knowledge can limit the number of
17 users that can operate the tool, creating accessibility issues within an organization
18 and for outside parties. Importantly, this can lead to unnoticed errors within the
19 modeling or, just as importantly, a lack of confidence in the results. Allowing for a
20 thorough, independent review builds trust in the numbers, which is especially
21 important for a new portfolio.¹⁵

22 Based on this discussion, Ms. Goldberg recommends that:

23 Evergy form a working group to help facilitate the development of a transparent
24 TRM. This group should consist of a range of stakeholders that develop a plan to
25 improve the TRM and other related tasks. In the beginning, this group should
26 establish a charter to describe the roles and responsibilities of the group and of
27 individual members, and procedures for voting, requesting meetings, or suggesting

¹² Direct Testimony of Stacy L. Sherwood, page 22, lines 12-19.

¹³ Direct Testimony of Alice Napoleon, page 28, lines 1-4.

¹⁴ Direct Testimony of Danielle Goldberg, page 3, lines 10-13.

¹⁵ Ibid., page 10, line 18 – page 11, line 2.

1 issues for discussion. This group can review additional materials for best practices
2 for TRMs to ensure Evergy's new approach will be a success.¹⁶

3 **Q. Do the Gas Utilities support this recommendation?**

4 A. Yes. This is essentially the recommendation made by NRDC Witness Stacy Sherwood,
5 and the Gas Utilities strongly support it. However, it should be implemented immediately
6 and not as part of some future DSM plan as indicated on page 20, lines 3-13. Furthermore,
7 the Gas Utilities should be granted membership in the recommended working group.

8 **V. CONCLUSIONS AND RECOMMENDATIONS**

9 **Q. Please summarize your testimony.**

10 A. With respect to the program changes proposed by the parties in this case, I conclude that:

- 11 1. Staff Witness Glass finds that both the Whole Business Efficiency Program and the
12 Enhanced New Construction Component of the Hard-to-Reach Business Program
13 exhibit benefit/cost results that are not consistent with guidance provided by the
14 KEEIA and the Commission's own cost-effectiveness guidance. The Gas Utilities
15 believe that the reassessment called for by Staff to fix these cost-effectiveness
16 issues is an excellent opportunity for Evergy to correct the "like-for-like" appliance
17 deficiencies that the Gas Utilities have identified so that the programs are consistent
18 with KEEIA and prior Commission orders.
- 19 2. CURB Witness Napoleon recommends that the Commission direct Evergy to
20 develop offerings for residential new construction. The Gas Utilities reject this
21 recommendation as it does not account for the Commission's prohibition against
22 fuel switching and KEEIA's requirement of incentive payments for "like-for-like"
23 technologies.
- 24 3. The Gas Utilities are also concerned with the recommendation made by CEP
25 Witness Justin B. Schott that the number of incentives for air and water heater heat
26 pumps in the Evergy portfolio should be "considerably higher." To the extent that
27 any incentive for heat pumps targets current and future natural gas applications, the
28 Gas Utilities object as the payment of such incentives is in violation of KEEIA and
29 prior Commission Orders, as explained more fully in my direct testimony.

30 With respect to the proposed changes to Evergy's TRM, the reporting of program results,
31 and the development of inputs for the TRM:

¹⁶ Ibid., page 19, lines 4-10.

- 1 4. Mr. Haynos’s recommendation that the Commission should allow Staff to hire an
2 EM&V auditor seems to be a reasonable recommendation that can be supported by
3 the Gas Utilities. However, the Gas Utilities would further request that this process
4 and its results be transparent so that all parties can assure themselves that the results
5 are accurate and that Evergy is not using its rebates to gain load at the expense of
6 the Gas Utilities, in violation of KEEIA and Commission precedent.
- 7 5. The Gas Utilities support the recommendation of NRDC Witness Sherwood and
8 CURB Witness Goldberg that Evergy form a working group to help facilitate the
9 development of a transparent TRM. The Gas Utilities further recommend that it be
10 implemented immediately and not as part of some future DSM plan. Furthermore,
11 the Gas Utilities should be granted membership in the recommended working
12 group.

13 **Q. What do you recommend?**

14 A. In addition to the recommendations developed in my direct testimony, I recommend that:

- 15 1. The Gas Utilities recommend that the Commission approve Staff’s proposed
16 reassessment of the Whole Business Efficiency Program and Hard-to-Reach
17 Business Program. Within this reassessment, the Gas Utilities recommend that the
18 Commission require Evergy to correct the “like-for-like” appliance deficiencies
19 that have been identified to make these programs consistent with KEEIA and prior
20 Commission orders.
- 21 2. The Gas Utilities recommend that the Commission reject CURB Witness
22 Napoleon’s recommendation that the Commission direct Evergy to develop
23 offerings for residential new construction, as this recommendation does not account
24 for the Commission’s prohibition against fuel switching and KEEIA’s requirement
25 of incentive payments for “like-for-like” technologies.
- 26 3. The Gas Utilities recommend that the Commission reject the recommendation by
27 CEP Witness Justin B. Schott to increase the number of incentives for air and water
28 heater heat pumps unless it can be shown that any incentive for heat pumps does
29 not target current and future natural gas applications.
- 30 4. If the Commission approves Staff’s request to hire an EM&V auditor, the Gas
31 Utilities would recommend that this process and its results be transparent so that all
32 parties can assure themselves that the results are accurate and that Evergy is not
33 using its rebates to gain load at the expense of the Gas Utilities, in violation of
34 KEEIA and Commission precedent.
- 35 5. The Gas Utilities recommend that the working group proposed by NRDC Witness
36 Sherwood and CURB Witness Goldberg to help facilitate the development of a
37 transparent TRM be implemented immediately and not as part of some future DSM
38 plan and that the Gas Utilities be granted membership in the recommended working
39 group.

1 **Q.** **Does that complete your cross-answering testimony?**

2 **A.** Yes, it does.

3

1 VERIFICATION

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3
4 STATE OF MARYLAND)
5) ss.
6 COUNTY OF MONTGOMERY)
7
8
9

10 Paul H. Raab, being duly sworn upon his oath, deposes and states that he is a consultant for
11 Atmos Energy Corporation, Black Hills/Kansas Gas Utility Company, LLC d/b/a Black Hills
12 Energy, and Kansas Gas Service, a division of ONE Gas, Inc.; that he has read and is familiar
13 with the foregoing Cross-Answering Testimony filed herewith; and that the statements made
14 therein are true to the best of his knowledge, information, and belief.
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Paul H. Raab

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22 Subscribed and sworn to before me this 22 day of June 2022.
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28 NOTARY PUBLIC
29

30 My appointment Expires:

31 May 1, 2023
32
33
34

DAVID KIM
Notary Public - State of Maryland
Montgomery County
My Commission Expires May 1, 2023



CERTIFICATE OF SERVICE

I, Robert Elliott Vincent, hereby certify that a copy of the above and foregoing *Testimony* was forwarded this 24th day of June 2022, addressed to:

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